

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

City of Chicago;
City and County of Denver; and
Pima County;

Plaintiffs,

vs.

United States Department of Homeland
Security;
Kristi Noem, in her official capacity as
Secretary of the Department of Homeland
Security;
United States Federal Emergency Management
Agency;
David Robinson, in his official capacity as
Acting Administrator of the Federal Emergency
Management Agency;

Defendants.

Case No. 25-cv-5463

Hon. Matthew F. Kennelly

JOINT STATUS REPORT

Pursuant to the Court's orders dated October 31, 2025, and November 8, 2025, the parties submit this joint status report.

1. The Court granted in part the Plaintiffs' Motion for Preliminary Injunction on October 31, 2025.
2. Defendants filed a Motion to Clarify the Scope of the Preliminary Injunction on November 4, 2025, which the Court has taken under advisement.
3. Plaintiffs have expressed interest to Defendants in exploring whether a settlement is possible. If settlement is not possible, Plaintiffs may need to seek additional relief in the form of a motion to enforce the preliminary injunction by compelling a timely response to Plaintiffs' reimbursement requests within 30 days of submission, pursuant to 2 C.F.R. § 200.305(b)(3).

4. The Parties are still discussing next steps in this case and request an additional two weeks, until November 24, 2025, to agree on what is necessary to reach final judgment or, alternatively, to submit competing proposals to the Court.

Dated: November 10, 2025

Respectfully submitted,

Mary B. Richardson-Lowry
Corporation Counsel of the
City of Chicago

By: /s/ Lucy Prather
Lucy Prather (IL Bar N.
6337780)
Stephen Kane (IL Bar N.
6272490)
121 North LaSalle Street,
Room 600
Chicago, Illinois 60602
Tel: 312-744-4294
lucy.prather@cityofchicago.org
Stephen.kane@cityofchicago.org
*Attorneys for Plaintiff City of
Chicago*

Michiko (Miko) Ando Brown,
City Attorney, City and County
of Denver

By: /s/ Katie McLoughlin
Katie McLoughlin (CO Bar
No. 51980)
Matthew J. Mulbarger (CO Bar
No. 51918)
Denver City Attorney's Office
201 W Colfax Avenue
Denver, CO 80202
Tel: 720-913-8050
katie.mcloughlin@denvergov.org
matthew.mulbarger@denvergov.org
*Attorneys for Plaintiff City and
County of Denver*

Laura Conover
Pima County Attorney

By: /s/ Bobby Yu
Samuel E. Brown (AZ Bar
No. 027474)
Bobby Yu (AZ Bar No.
031237)
Kyle Johnson (AZ Bar No.
032908)
Pima County Attorney's
Office, Civil Division
32 N. Stone, Suite 2100
Tucson, Arizona 85701
Tel: (520) 724-5700
sam.brown@pcao.pima.gov
bobby.yu@pcao.pima.gov
kyle.johnson@pcao.pima.gov
*Attorneys for Plaintiff
Pima County*

ANDREW S. BOUTROS
United States Attorney

By: s/ Patrick Johnson
THOMAS P. WALSH
PATRICK JOHNSON
Assistant United States Attorneys
219 S. Dearborn Street, 5th Floor
Chicago, Illinois 60604
(312) 353-5327
(312) 353-5312
thomas.walsh2@usdoj.gov
patrick.johnson2@usdoj.gov